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— CITY OF PORTLAND —
ENVIRONMENTAL SERVICES

1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204 ▪ Dan Saltzman, Commissioner ▪ Dean Marriott, Director

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Environmental
Cleanup Office

December 1, 2011

Jim Orr
Oregon Department of Environmental Quality
2020 SW 4th Avenue, Suite 400
Portland, OR 97201-4987

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1396379

Subject: Review of *Updated Source Control Evaluation Report, McCall Oil and Chemical Site* (dated May 2011)

Dear Jim:

This letter provides comments from the City of Portland Bureau of Environmental Services (City) to the Oregon Department of Environmental Quality (DEQ) based on our review of the above referenced document (Updated SCE Report) submitted by Anchor QEA, LLC on behalf of the McCall Oil and Chemical Corporation (McCall). These comments are provided in accordance with the joint objectives of the Intergovernmental Agreement between DEQ and the City for identifying and evaluating discharges to the City's shared stormwater collection system and making recommendations regarding appropriate source control measures.

Stormwater from a portion of the McCall site discharges to the Willamette River via City Outfall 22. Outfall 22 discharges within a river reach identified by the U.S. Environmental Protection Agency as an area of potential concern (AOPC 16) for metals, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and other contaminants.[1] The City commented on the previous version of this report (February 2009 SCE Report)[2] and appreciates McCall's efforts on the comments it addressed. Our review of the Updated SCE Report indicates additional information is needed to conclude that necessary source controls are in place regarding site discharges to the river via Outfall 22. Our specific comments are provided below.

Data Representativeness

1. The report does not provide the information needed to demonstrate that the stormwater and catch basin solids data collected from Drainage Area 3 (locations S-1 and S-2) represent all potential onsite source areas connected to the City stormwater conveyance system. DEQ guidance for evaluating upland site stormwater pathways includes descriptions of the rationale used for selecting solids and stormwater sampling locations (and not sampling others) to support data interpretation. Figure 3 indicates six separate connections to the City system; a rationale was not presented to support the two

[1] U.S. Environmental Protection Agency (EPA), 2010. Re: Portland Harbor Superfund Site; Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240. Portland Harbor Feasibility Study Source Tables. Letter from EPA to Mr. Bob Wyatt, Chairman, Lower Willamette Group. November 23, 2010.

[2] BES, 2009. Subject: Review of *Remedial Investigation Report*, dated October 2008 (RI) and *Source Control Evaluation Report, McCall Oil and Chemical Site*, dated February 2009 (SCE). Letter to J. Orr (DEQ) from R. Struck (BES). June 26, 2009.

sampling locations selected for this drainage area. If data from this drainage area are not representative of all potential sources in this area, source control conclusions may not be relevant to discharges from the unsampled connections.

2. DEQ guidance for evaluating the upland site stormwater pathway includes a discussion of the presumed representativeness of stormwater sampling results based on a number of site and storm-specific variables (e.g., operational activities, antecedent dry period, sample timing, rainfall intensity, etc.). The Updated SCE Report does not discuss the potential impact of these key factors on sample representativeness; this information is an important component of the weight-of-evidence evaluation and should be provided to support report conclusions and future site decisions.

Effectiveness of Source Control Measures

3. The source control measures (SCMs) effectiveness evaluation presented in Section 7.7.2 of the Updated SCE Report does not adequately support the report's conclusion that stormwater SCMs implemented at this site have resulted in lower contaminant concentrations in site stormwater discharges. The major shortcomings of this evaluation are detailed in our comments on the February 2009 SCE Report and are briefly reiterated below.

    a. The report does not describe the chronology of SCM implementation during the 2000 - 2010 period for which the NPDES permit monitoring data are evaluated. Therefore, it is not possible to evaluate the effect of SCMs on stormwater contaminant concentrations (i.e., by comparing pre-SCM concentrations to post-SCM concentrations).

    b. The NPDES monitoring data are for a very limited set of constituents (e.g., not including PAHs). Therefore, SCM effectiveness conclusions that are based on evaluation of the NPDES data alone are speculative for non-monitored constituents.

4. The report does not discuss the following PAH data limitations or apparent data trends that raise uncertainty about the adequacy of the Drainage Area 3 data set for characterizing PAH discharges to the City conveyance system and evaluating how well PAH sources to the system are being controlled.

    a. PAH concentrations in stormwater from S-1 and S-2 (as shown in Table 6) do not appear to show a decreasing trend.

    b. The total PAHs concentrations detected in the May 2010 solids samples collected from S-1 and S-2 were higher than concentrations detected in previous solids samples from these locations (see Table 9). In addition, the total PAHs concentration in the May 2010 sample from S-1 (30,000 ug/Kg) is elevated relative to the reference concentration ranges compiled by DEQ.[3]

[3] DEQ, 2010. "Tool for Evaluating Stormwater Data" – Appendix E to *Guidance for Evaluating the Stormwater Pathway at Upland Sites*. January 2009 (updated October 2010).

c. Laboratory method reporting limits for detection of PAHs in the June 2010 stormwater data were elevated an order-of-magnitude above the JSCS screening level values for many of the individual PAHs.

Stormwater Drainage System

5. The Updated SCE Report includes a new, more detailed stormwater drainage area drawing (Figure 3), which addresses some of the City's earlier questions about site drainage areas. However, four catch basins are included in Drainage Area 3 but have no identified point of discharge. If these are UICs, the affiliated drainage area should be removed from Drainage Area 3. If they do convey stormwater to Basin 22, connections to the City system should be shown. The drawing should be revised to clarify site drainage to Basin 22.

This information is needed to support the conclusion that source control is in place at this facility and in Outfall Basin 22. Without it, these informational gaps will be identified in the summary report for identification and control of sources in Outfall Basin 22. The City appreciates the ongoing collaboration with DEQ on identifying and controlling contaminant sources to City conveyance systems. If you have any questions, please contact me at 503-823-2296.

Sincerely,

Linda Scheffler
Water Resources Program Manager
Portland Harbor Program

c: Alex Liverman / DEQ
Richard Muza / EPA
Kristine Koch / EPA
Kim Cox/City of Portland, Bureau of Environmental Services
Ted McCall / McCall Oil and Chemical
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